

HARRIS

ST. LAURENT

WECHSLER

August 19, 2022

BY ECF

The Honorable Judge Loretta A. Preska
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Ishan Wahi, et al., 22 Cr. 392 (LAP)

Dear Judge Preska,

We represent Ishan Wahi in the above-referenced matter. On consent with the government, we write to respectfully request a modification of Ishan Wahi's bond conditions.

On August 3, 2022, this Court set Ishan Wahi's conditions of release which included, as agreed upon by the parties, location monitoring by GPS and a curfew from 9:00 p.m. to 6:00 a.m. However, the Appearance Bond generated by Pretrial Services failed to note the curfew.

In discussing this with the government in advance of submitting this letter, we obtained the government's consent to modify the bail conditions such that Ishan Wahi is not subject to a curfew and is instead subject to "Stand Alone" GPS location monitoring. Accordingly, we respectfully request that this Court modify the current conditions of release as to Ishan Wahi to indicate that Ishan Wahi is subject to Stand Alone Monitoring within WDMA and SDNY, as noted in subsection (7)(p) of the Appearance Bond.

Mr. Ishan Wahi's co-defendant, Nikhil Wahi, sought substantially identical relief from the Court earlier this week, also with the consent of the government, which the Court granted on August 15th.

We have conferred with the government, which consents to this request.

Respectfully,



Andrew St. Laurent